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January 10, 2020

Via ECF

Hon. Judge Andrew L. Carter
U.S. District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: Jacqueline Gray v. Mid-Bronx CCRP Early Childhood Center, Inc. et al
Index No. 18-CV-7934 (ALC) (OTW)

Dear Hon. Judge Carter:

This office is co-counsel in our representation of Defendants in the above referenced matter, and I write to respectfully request an extension of the deadline to submit a settlement agreement and motion for court approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199 (2d Cir. 2015). The current deadline is January 10, 2020.

I am happy to report that after extensive further negotiation, the parties have been able to successfully resolve the unanticipated challenge that arose following our initial settlement in principle. Moreover, counsel for the parties have worked diligently and cooperatively, and we have finalized a written settlement agreement, which we will be submitting to the court with Plaintiffs' motion for settlement approval. However, in addition to the one individually named defendant, there are seven entities named as defendants in this action. Each defendant entity a non-profit institution made up of separate boards and Chairpersons. Therefore, the parties need additional time to obtain the signatures from all parties necessary to in order to fully execute this settlement agreement.


In light of the foregoing, we respectfully request one final extension – until January 24, 2019. This is the fourth request for an extension. I have conferred with counsel for Plaintiffs, and he consents to this request. Should the court grant the parties' request, no other future deadlines would be affected.

Thank you for your time and consideration regarding this matter.

Very truly yours,

/S/
Joshua Beldner

CC: VIA ECF
Counsel for all parties

SO ORDERED:


HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

January 13, 2022